

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE  
Case No. 22-11068 (KBO)  
Related Docket Nos.: 31148, 32231

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US BANKRUPTCY COURT  
DISTRICT OF DELAWARE

In re:  
FTX Trading Ltd., et al.,  
Debtors

**MOTION TO COMPEL DISTRIBUTION OF POST-PETITION INTEREST AND DISCLOSURE  
OF NEXT DISTRIBUTION SCHEDULE**

Filed by: Shirong Wang  
Regarding Claim No. 38517 – USD \$351,005.17 (Allowed)

Honorable Judge Owens:

I, Shirong Wang, a creditor with an Allowed Claim in the above-captioned case, respectfully submit this motion to:

1. Compel the FTX Recovery Trust to issue post-petition interest payments on my claim pursuant to 11 U.S.C. §726(a)(5) and/or applicable provisions under the confirmed reorganization plan;
2. Compel the FTX Recovery Trust to disclose a clear and public timeline for the next distribution round, including whether such distribution will include interest payments.

**1. Background**

Claim No.: 38517 (previously 24587)

Allowed Amount: USD \$351,005.17

Portal Status: Allowed

Pre-Distribution Requirements: Fully completed

Platform Linked: Kraken (ready to receive)

Recovered To Date: USD \$274,401.67

Percentage Recovery: ~78.2%

Principal has not been fully repaid. Approximately \$76,000 remains unpaid. Therefore, the request for interest herein is not contingent on full principal recovery but is grounded in the fact that the Recovery Trust holds sufficient assets and that the recovery rate is already near-complete. Similar scenarios in prior bankruptcy cases have justified post-petition interest payment under these circumstances.

I have received no post-petition interest to date. The Claims Portal reports zero interest paid.

**2. Legal Basis for Interest Compensation**

Under 11 U.S.C. §726(a)(5), creditors are entitled to simple interest on allowed unsecured claims at the legal rate from the petition date until the date of payment, once principal is substantially recovered.

In this case:

Petition Date: November 11, 2022

Current Date: October 2025

Elapsed Time: ~2.92 years

Interest Rate: 9%

Estimated Interest:

$\$351,005.17 \times 0.09 \times 2.92 \approx \$92,243.40$

This amount is above and beyond the principal, and its payment is supported by both the Bankruptcy Code and the equitable principle that a creditor should be made whole.

### **3. Prior Attempts to Resolve**

I submitted two good-faith proposals to FTX counsel on August 8, 2025, requesting written confirmation of distribution eligibility or partial early payment. These were met with no substantive written response.

I have cooperated throughout the process, completed all pre-distribution requirements, and only seek enforcement of basic creditor rights already contemplated by law and by FTX's own public statements.

Furthermore, for any portion of the principal claim not yet repaid as of the September 30, 2025 Distribution Date, I respectfully request that interest continue to accrue on such unpaid balances until the date of full payment, at the applicable rate of 9% per annum under governing law.

### **4. Request for Next Distribution Timeline**

As of October 2025, no public or formal schedule has been released by the Recovery Trust regarding the next distribution.

This uncertainty materially harms creditor interests and violates the principle of transparent fiduciary administration. Given that the Trust has already made significant distributions, it is both reasonable and necessary to compel disclosure of a timeline, especially concerning the inclusion of post-petition interest.

### **5. Relief Requested**

I respectfully request the Court to issue an order that:

1. Directs the Recovery Trust to compute and pay post-petition interest on my Allowed Claim #38517, covering the period from November 11, 2022 to the final distribution date, at a simple interest rate of 9%;

2. Requires the Recovery Trust to publicly disclose, within 30 days, a formal timeline for the next creditor distribution, including whether post-petition interest will be addressed;
3. Grants such further relief as the Court deems just and proper.

Dated: October 06, 2025

Respectfully submitted,

Shirong Wang

#### **CERTIFICATE OF SERVICE**

I, Wang Shirong, hereby certify that on October 06, 2025, I caused a copy of this Motion (Letter to the court) via email upon the following parties listed below. In addition, I sent a cover letter and copy of this objection to the Office of the United States Trustee.

Sullivan & Cromwell LLP

- James L. Bromley – bromleyj@sullcrom.com
- Alexa J. Kranzley – kranzleya@sullcrom.com
- Andrew G. Dietderich – dietdericha@sullcrom.com
- Brian D. Glueckstein – gluecksteinb@sullcrom.com

Landis Rath & Cobb LLP

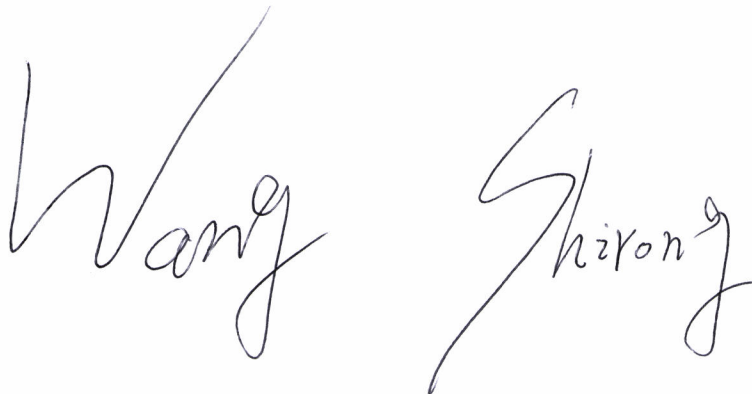
- Adam G. Landis – landis@lrclaw.com
- Kimberly A. Brown – brown@lrclaw.com
- Matthew R. Pierce – pierce@lrclaw.com

Office of the United States Trustee

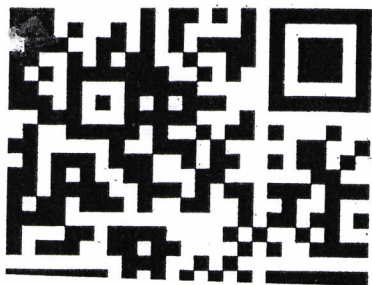
- Juliet M. Sarkessian – juliet.m.sarkessian@usdoj.gov
- Benjamin A. Hackman – benjamin.a.hackman@usdoj.gov
- David Gerardi – david.gerardi@usdoj.gov

I certify under penalty of perjury that the foregoing is true and correct.

Dated: October 06, 2025

A handwritten signature in black ink, reading "Wang Shirong". The signature is written in a cursive, flowing style. The first name "Wang" is on the left, and "Shirong" is on the right, connected by a long, sweeping horizontal stroke.

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Re: Objectior  
to Implement  
Recovery Trus  
Jurisdiction  
- Case No. 22

ORIGIN ID: NSZA (437) 220-9229  
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C/O FASC  
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CA

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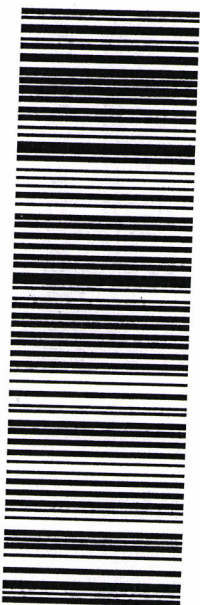
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